

Comments of EuRIC on the Industry Voluntary Agreement to improve environmental performance of imaging equipment placed on the European market

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Following the publication of a draft Voluntary agreement (VA) v.5 as of 7th October 2020, to improve the environmental performance of imaging equipment placed on the European Market, and in addition to the comments made on previous drafts, EuRIC is pleased to share the following comments on the new draft VA.

Regarding material recovery in particular, EuRIC has a few though critical points to improve the recyclability of printers and scanners. EuRIC continues to strongly request the inclusion of material efficiency requirements into the imaging equipment Voluntary Agreement, in order to link their design phase with the requirements and targets set by the WEEE directive.

From a more generic viewpoint, EuRIC continues to strongly question the adequacy of a VA in lieu of binding eco-design requirements set in a standard regulation to achieve the desired objectives be it in terms of energy-efficiency, re-usability and reparability, recyclability and recycled content, regarding **both** devices as well as consumables such as cartridges and containers. Using the vehicle of a VA is completely at odd with the emphasis placed in the new Circular Economy Action Plan on sustainable products' policy and the forthcoming legislative initiative in that respect.

While EuRIC appreciates the inclusion of cartridges and containers to the new draft of the VA as supported by several member states, the described methodology and system of supporting signatories seems very questionable. There is no clear comprehensible framework being set for cartridges and containers and a lot of byways seem to be defined to work around the pictured approaches in this VA. In addition, the draft VA does not set any targets for repair and re-use of cartridges and containers, which is at odd with the objectives of the revised waste framework (WFD) directive and the WEEE Directive. Last but not least, as it stands, the draft VA will likely trigger market access-related matters which may not comply with European competition law rules.

Proposals to improve the recyclability of imaging equipment:

7.2 Design for Recycling:

1. Cartridges and Containers, especially ink cartridges, when there is no more power (which is the case in WEEE treatment plants) cannot be easily removed contrary to the obligations set by the ANNEX VII of Directive 2012/19/EU. This is in many cases both time consuming and damaging for the integrity of the printers since components and equipment need to be broken in order to access and remove the containers and/or cartridges.

Furthermore, one more issue often encountered by repair and recycling centers is the treatment of waste printers with external containers. These containers are linked to the printers by rubber hoses and when removed, the ink leftovers may leak through them posing a possible danger to both the environment and human health. From a financial perspective, repairing those printers may also pose a burden to repair centers as the old rubber hoses often have to be substituted with new ones.

⇒ Hence, it is important to ensure that mechanically ink cartridges can be easily removed even when the device is in “OFF” mode (in recycling facilities, a number of end-of-life printers no longer work and even if they would, operators in dismantling lines will not individually switch them on, since it is both time consuming and risky).

Therefore, **In part 7.3.1 of the draft VA v. 5**, EuRIC continues to require that the removability of toners and ink cartridges shall be possible when the device is switched off without the need for electrical power, and;

⇒ That printers should be designed in a way in which cartridges and containers are placed inside, making at the same time possible easy dismantling in order to further enhance activities related to reuse and repair, ultimately contributing to circular economy.

2. As previously requested, the location of the cartridges and containers - particularly the toner and waste toner tanks - should be marked clearly in all devices by a showy label or other appropriate marking. This will enable WEEE treatment facilities to easily identify all toner containing parts or removables and then remove them in accordance with Annex VII of the “WEEE-Directive”, before mechanical treatment of the devices is performed. Such marking, will also help the above mentioned facilities to minimize the risk of and even prevent all kinds of dust related incidents (explosions, fires, etc.) during the treatment process.
3. In part 7.2.1 c) of the VA, it is provided that “*Non-separable connections (e.g. glued, welded) between different materials shall be avoided unless they are technically or legally required*”. EuRIC asks for a clear clarification of these technical requirements, to avoid unjustified non-separable connections, to be included to Annex D-2 clarifications of the VA.
4. **Scanners** or scanning devices in MFP devices do contain lamps. Discharge lamps are difficult to remove but have to be in accordance with Annex VII of Directive 2012/19/EU.
 - ⇒ Discharge lamps should be designed in a way that they can be easily removed, in accordance with the requirements set out in ANNEX VII of the WEEE Directive. This will foster repair options for those devices as well.

7.7 Recycled plastic content:

As rightly acknowledged before, in the background evaluation for the drafting of the previous suggestion for a VA “Most material volume in imaging equipment products consists of common plastics (e.g. PS (HI-PS), ABS, PC)”. These styrenic polymers are widely used in

imaging equipment and can easily be recycled – process-wise – by plastics recyclers processing technical plastics. Some recyclers even shred imaging equipment separately to isolate these plastics while others shred them with small domestic appliances often containing the same type of plastics. The output then follows the usual recycling route for plastics from WEEE with different steps of separation/processing in particular if brominated flame retardants are present up to the extrusion phase and the production of recycled plastic pellets. The most important issue that plastics’ recyclers currently face, is the lack of sustained demand for recycled plastics from imaging equipment manufacturers despite the fact that such equipment contains, especially for consumer printers, a very high share of plastics.

- ⇒ Hence, a **minimum 20% target of post-consumer recycled plastic content** (which is considered a rather conservative target) for all types of imaging equipment, is instrumental to pull the demand for recycled plastic in imaging equipment and must be implemented.

This target should be measured out of the total plastic used in the product and should be fixed as clear quota in point 7.7 of the VA.

8. Information Requirements for End-Users

To improve the recyclability of these devices and support the reuse of cartridges and containers, EuRIC recommends to support the separation of cartridges and containers from the device before final disposal by the end user. The end-user should be properly informed about this necessary separation, which aims to keep cartridges and containers separated from the devices within the collection group. This will not only support the reuseability by fostering the available volume streams of “empties” in general, but will also prevent the risk of unidentified cartridges remaining in printers - by the treatment centers -, which could put in danger the above referred centers during the mechanical treatment process.

9. Cartridge and Container Commitments

The absence of reuse targets for all cartridges is again at odd with the objectives set by the new CEAP. To enhance the reuse & repair of cartridges and containers and support proper WEEE treatment, EuRIC suggests to set a mandatory reuse quota within chapter 9 of the VA for cartridges & containers of at least 45% within two years and 60% within four years of the entry into force of the VA (VA / regulation). Finally, to further support the reuse and recycling of cartridges and containers, EuRIC strongly recommends that greater attention is given – in this chapter - on how used imaging equipment should be collected and transported in order to avoid any damages which will undoubtedly pose a challenge to both repair and recycling centers from a financial, health & safety as well as environmental viewpoint.

With regard to End-of-Life Management of Cartridges and Containers under **Annex J** of the VA, EuRIC appreciates the fact that signatories commit to aim for continuous improvement for the management of end-of-life Cartridges and Containers in accordance with the policy set out in Article 4 of Directive 2008/98/EC (“Waste Hierarchy”). The most desirable direction is waste prevention, or more precisely, delaying the time of when cartridges and containers finally become waste (only due to mechanical defects of the body itself and not

because of the fact that they are “emptied”), which is also step number two in the waste hierarchy (increase preparation for reuse (including remanufacturing and refilling)).



EuRIC is the Confederation representing the interests of the European recycling industries at EU level. EuRIC, through its various Branches covering the vast majority of waste streams, brings together National Recycling / Resource Management Federations and Companies in lieu from more than 23 European countries active locally and globally.

EuRIC represents across Europe over:

- § 5,500+ companies generating an aggregated annual turnover of about 95 billion €, including large companies and SMEs, involved in the recycling and trade of various resource streams;
- § 300,000 local jobs which cannot be outsourced to non-EU countries;
- § Million tons of waste recycled per year (metals, paper, glass, plastics, WEEE, ELVs, tyres, textiles and beyond).

By turning wastes into resources, recycling is the link which reintroduces recycled materials into the value chains again and again. Recyclers play a key role in bridging resource efficiency, climate change policy and industrial transition.
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